

III. JURISDICTION AND VENUE

8. Defendant admits the allegations of paragraph 8 of Plaintiffs' Complaint.
9. Defendant denies the allegations of paragraph 9 of Plaintiffs' Complaint.
10. Defendant denies the allegations of paragraph 10 of Plaintiffs' Complaint.
11. Defendant denies the allegations of paragraph 11 of Plaintiffs' Complaint.
12. Defendant admits the allegations of paragraph 12 of Plaintiffs' Complaint.

IV. STATUTORY STRUCTURE FDCA

13. Defendant incorporates by reference the answers contained in paragraphs 1 through 12. inclusive.

14. As to the allegations in paragraph 14 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

15. As to the allegations in paragraph 15 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

16. As to the allegations in paragraph 16 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

17. As to the allegations in paragraph 17 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

18. As to the allegations in paragraph 18 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

19. As to the allegations in paragraph 19 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

20. As to the allegations in paragraph 20 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

21. As to the allegations in paragraph 21 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

22. As to the allegations in paragraph 22 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

23. As to the allegations in paragraph 23 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

24. As to the allegations in paragraph 24 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

25. As to the allegations in paragraph 25 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

26. As to the allegations in paragraph 26 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

27. As to the allegations in paragraph 27 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

28. As to the allegations in paragraph 28 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

29. As to the allegations in paragraph 29 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

30. As to the allegations in paragraph 30 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

31. As to the allegations in paragraph 31 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

32. As to the allegations in paragraph 32 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

33. As to the allegations in paragraph 33 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

34. As to the allegations in paragraph 34 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

35. As to the allegations in paragraph 35 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

36. As to the allegations in paragraph 36 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

V. STATUTORY STRUCTURE TDCPA

37. Defendant incorporates by reference the answers contained in paragraphs 1 through 36, inclusive.

38. As to the allegations in paragraph 38 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

39. As to the allegations in paragraph 39 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

40. As to the allegations in paragraph 40 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

41. As to the allegations in paragraph 41 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

42. As to the allegations in paragraph 42 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

43. As to the allegations in paragraph 43 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

44. As to the allegations in paragraph 44 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

45. As to the allegations in paragraph 45 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

46. As to the allegations in paragraph 46 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

47. As to the allegations in paragraph 47 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

VI. STATUTORY STRUCTURE WCPA

48. Defendant incorporates by reference the answers contained in paragraphs 1 through 47, inclusive.

49. As to the allegations in paragraph 49 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

50. As to the allegations in paragraph 50 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

51. As to the allegations in paragraph 51 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

52. As to the allegations in paragraph 52 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

VII. STATUTORY STRUCTURE OF THE WCAA

53. Defendant incorporates by reference the answers contained in paragraphs 1 through 52, inclusive.

54. As to the allegations in paragraph 54 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

55. As to the allegations in paragraph 55 of Plaintiffs' Complaint, Defendant admits the statute speaks for itself, denying specifically any particular interpretation of the statute by Plaintiffs and specifically denying any violation thereof.

VIII. FACTS COMMON TO ALL COUNTS

56. Defendant incorporates by reference the answers contained in paragraphs 1 through 55, inclusive.

57. Defendant admits the allegations of paragraph 57 of Plaintiffs' Complaint.

58. Defendant denies the allegations of paragraph 58 of Plaintiffs' Complaint.

59. Defendant admits the allegations of paragraph 59 of Plaintiffs' Complaint.

60. Defendant admits the allegations of paragraph 60 of Plaintiffs' Complaint.

61. Defendant admits the allegations of paragraph 61 of Plaintiffs' Complaint.

62. Defendant admits the allegations of paragraph 62 of Plaintiffs' Complaint.

63. Defendant admits the allegations of paragraph 63 of Plaintiffs' Complaint.

64. Defendant admits the allegations of paragraph 64 of Plaintiffs' Complaint.

65. Defendant admits the allegations of paragraph 65 of Plaintiffs' Complaint.

66. Defendant admits the allegations of paragraph 66 of Plaintiffs' Complaint.

67. Defendant admits the allegations of paragraph 67 of Plaintiffs' Complaint.

- 68. Defendant admits the allegations of paragraph 68 of Plaintiffs' Complaint.
- 69. Defendant admits the allegations of paragraph 69 of Plaintiffs' Complaint.
- 70. Defendant admits the allegations of paragraph 70 of Plaintiffs' Complaint.
- 71. Defendant admits the allegations of paragraph 71 of Plaintiffs' Complaint.
- 72. Defendant admits the allegations of paragraph 72 of Plaintiffs' Complaint.
- 73. Defendant admits the allegations of paragraph 73 of Plaintiffs' Complaint.
- 74. Defendant admits the allegations of paragraph 74 of Plaintiffs' Complaint.
- 75. Defendant admits the allegations of paragraph 75 of Plaintiffs' Complaint.
- 76. Defendant admits the allegations of paragraph 76 of Plaintiffs' Complaint.

IX. COUNT 1 FDCPA VIOLATIONS

77. Defendant incorporates by reference the answers contained in paragraphs 1 through 76, inclusive.

- 78. Defendant denies the allegations of paragraph 78 of Plaintiffs' Complaint.
- 79. Defendant denies the allegations of paragraph 79 of Plaintiffs' Complaint.
- 80. Defendant denies the allegations of paragraph 80 of Plaintiffs' Complaint.
- 81. Defendant denies the allegations of paragraph 81 of Plaintiffs' Complaint.
- 82. Defendant denies the allegations of paragraph 82 of Plaintiffs' Complaint.
- 83. Defendant denies the allegations of paragraph 83 of Plaintiffs' Complaint.
- 84. Defendant denies the allegations of paragraph 84 of Plaintiffs' Complaint.
- 85. Defendant denies the allegations of paragraph 85 of Plaintiffs' Complaint.
- 86. Defendant denies the allegations of paragraph 86 of Plaintiffs' Complaint.
- 87. Defendant denies the allegations of paragraph 87 of Plaintiffs' Complaint.
- 88. Defendant denies the allegations of paragraph 88 of Plaintiffs' Complaint.

- 89. Defendant denies the allegations of paragraph 89 of Plaintiffs' Complaint.
- 90. Defendant denies the allegations of paragraph 90 of Plaintiffs' Complaint.
- 91. Defendant denies the allegations of paragraph 91 of Plaintiffs' Complaint.
- 92. Defendant denies the allegations of paragraph 92 of Plaintiffs' Complaint.
- 93. Defendant denies the allegations of paragraph 93 of Plaintiffs' Complaint.
- 94. Defendant denies the allegations of paragraph 94 of Plaintiffs' Complaint.

X. COUNT 2 VIOLATIONS OF THE TDCPA

As to the unnumbered paragraph immediately preceding paragraph 95, Defendant incorporates the answers in paragraphs 1-94, inclusive.

- 95. Defendant denies the allegations of paragraph 95 of Plaintiffs' Complaint.
- 96. Defendant denies the allegations of paragraph 96 of Plaintiffs' Complaint.
- 97. Defendant denies the allegations of paragraph 97 of Plaintiffs' Complaint.
- 98. Defendant denies the allegations of paragraph 98 of Plaintiffs' Complaint.
- 99. Defendant denies the allegations of paragraph 99 of Plaintiffs' Complaint.
- 100. Defendant denies the allegations of paragraph 100 of Plaintiffs' Complaint.
- 101. Defendant denies the allegations of paragraph 101 of Plaintiffs' Complaint.
- 102. Defendant denies the allegations of paragraph 102 of Plaintiffs' Complaint.
- 103. Defendant denies the allegations of paragraph 103 of Plaintiffs' Complaint.
- 104. Defendant denies the allegations of paragraph 104 of Plaintiffs' Complaint.
- 105. Defendant denies the allegations of paragraph 105 of Plaintiffs' Complaint.
- 106. Defendant denies the allegations of paragraph 106 of Plaintiffs' Complaint.
- 107. Defendant denies the allegations of paragraph 107 of Plaintiffs' Complaint.
- 108. Defendant denies the allegations of paragraph 108 of Plaintiffs' Complaint.

109. Defendant denies the allegations of paragraph 109 of Plaintiffs' Complaint.

110. Defendant denies the allegations of paragraph 110 of Plaintiffs' Complaint.

111. Defendant denies the allegations of paragraph 111 of Plaintiffs' Complaint.

112. Defendant denies the allegations of paragraph 112 of Plaintiffs' Complaint.

113. Defendant denies the allegations of paragraph 113 of Plaintiffs' Complaint.

114. Defendant denies the allegations of paragraph 114 of Plaintiffs' Complaint.

XI. COUNT 3 VIOLATIONS OF WCPA

As to the unnumbered paragraph immediately preceding paragraph 115, Defendant incorporates the answers in paragraphs 1-114, inclusive.

115. Defendant denies the allegations of paragraph 115 of Plaintiffs' Complaint.

116. Defendant denies the allegations of paragraph 116 of Plaintiffs' Complaint.

117. Defendant denies the allegations of paragraph 117 of Plaintiffs' Complaint.

118. Defendant denies the allegations of paragraph 118 of Plaintiffs' Complaint.

XII. COUNT 4 VIOLATIONS OF THE WCAA

As to the unnumbered paragraph immediately preceding paragraph 119, Defendant incorporates the answers in paragraphs 1-118, inclusive.

119. Defendant denies the allegations of paragraph 119 of Plaintiffs' Complaint.

120. Defendant denies the allegations of paragraph 120 of Plaintiffs' Complaint.

121. Defendant denies the allegations of paragraph 121 of Plaintiffs' Complaint.

XIII. COUNT 5 TORTS VIOLATIONS

As to the unnumbered paragraph immediately preceding paragraph 122, Defendant incorporates the answers in paragraphs 1-121, inclusive.

122. Defendant denies the allegations of paragraph 122 of Plaintiffs' Complaint.

- 123. Defendant denies the allegations of paragraph 123 of Plaintiffs' Complaint.
- 124. Defendant denies the allegations of paragraph 124 of Plaintiffs' Complaint.
- 125. Defendant denies the allegations of paragraph 125 of Plaintiffs' Complaint.
- 126. Defendant denies the allegations of paragraph 126 of Plaintiffs' Complaint.
- 127. Defendant denies the allegations of paragraph 127 of Plaintiffs' Complaint.
- 128. Defendant denies the allegations of paragraph 128 of Plaintiffs' Complaint.
- 129. Defendant denies the allegations of paragraph 129 of Plaintiffs' Complaint.

AFFIRMATIVE DEFENSES

1. Plaintiffs' Complaint fails to state a claim against Defendant for which relief can be granted and should therefore be dismissed. Plaintiffs had multiple delinquent debts in the form of multiple bad checks written on separate occasions which violated criminal as well as civil laws. Defendant did not make illegal contact with Plaintiffs after Defendant received Plaintiffs' letters regarding each separate transaction and debt.

2. Plaintiffs' claims are barred by the equitable doctrines of estoppel and waiver.

3. Plaintiffs' Complaint violates Rule 11 of the Federal Rules of Civil Procedure in that it is presented for an improper purpose, aimed primarily at harassing, intimidating, or injuring the Defendant, and is not founded on facts or the law, and Defendant is therefore entitled to an award of all costs incurred in this action.

4. If Plaintiffs were damaged by Defendant's alleged misconduct, which Defendant denies, Plaintiffs failed to mitigate their damages and thus any award of damages must be reduced by such failure to mitigate.

5. If Defendant violated the FDCPA, which Defendant denies, the violation was not intentional and resulted from a bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid such errors.

6. There is no causal relationship between the alleged violations of the law and any specific loss.

7. Punitive damages are not recoverable in an action under the FDCPA.

8. Defendant did not and has not engaged in any conduct to harass, oppress, or abuse Plaintiffs.

9. Defendant did not and has not used any false, deceptive, or misleading representation or means in connection with the collection of Plaintiffs' debts, nor has Defendant used any unfair or unconscionable means to collect or attempt to collect Plaintiffs' debts.

10. At all times relevant to Plaintiffs' claims, Defendant had adopted and followed reasonable procedures to assure maximum possible accuracy of the information it obtained and disseminated.

11. Plaintiffs' Complaint and the claims therein constitute an abuse of process and malicious prosecution.

12. A 30 day validation notice is not required for bad checks, since the signature on the check validates the debt.

13. The bad checks written by Plaintiffs did not and do not constitute consumer debt under the unique facts of this case.

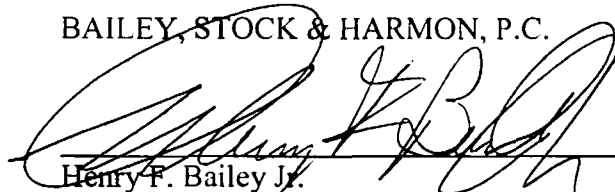
WHEREFORE, Defendant prays for relief and judgment against Plaintiffs as follows:

1. That Plaintiffs take nothing by reason of their Complaint, and that the same be dismissed with prejudice:

2. That Defendant be awarded its costs of suit;
3. For such other and further relief as the Court deems just and equitable.

Dated this 26 day of November, 2013.

BAILEY, STOCK & HARMON, P.C.



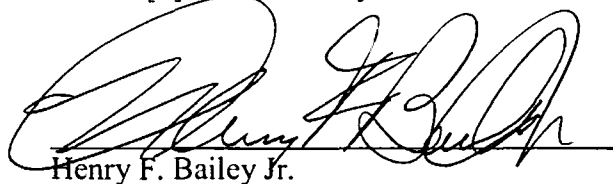
Henry F. Bailey Jr.
221 East 21st Street
P. O. Box 1557
Cheyenne, WY 82003
(307) 638-745

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **Answer to Complaint** was served in the manner defined below on November 26, 2013 to the following:

George & Kelly James
3422 Cribbon Avenue
Cheyenne, WY 82001

☐ Facsimile
☒ U.S. Mail – postage prepaid
☐ Hand delivery



Henry F. Bailey Jr.